

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

PEOPLE FIRST OF TENNESSEE,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:95-1227
)	Judge Sharp
)	Magistrate Judge Brown
CLOVER BOTTOM DEVELOPMENTAL)	(Cons. w/3:96-1056)
CENTER, et al.)	
)	
Defendants.)	

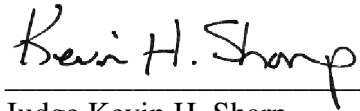
**~~PROPOSED~~ AGREED ORDER ON JOINT APPLICATION FOR
AWARD OF ATTORNEY'S FEES AND REIMBURSEMENT OF
EXPENSES TO THE PARENT GUARDIAN ASSOCIATIONS**

The Intervenor Parent Guardian Associations (the "PGA") and the State of Tennessee have filed a Joint Application For Award of Attorney's Fees and Reimbursement of Expenses to the PGA. The PGA are "prevailing parties" entitled to awards of expenses and reasonable attorney's fees in this case. The parties have agreed that One Hundred Twenty-Two Thousand Six Hundred Eighty-Five and No/100 Dollars (\$122,685.00) for attorney's fees and One Thousand One Hundred Eighteen and 75/100 Dollars (\$1,118.75) for expenses, which collectively represents an aggregate award of One Hundred Twenty-Three Thousand Eight Hundred Three and 75/100 Dollars (\$123,803.75), represents an appropriate award of attorney's fees and expenses for monitoring and enforcement related work during the period from July 1, 2010 through June 30, 2013.

Accordingly, it is hereby ordered that the Intervenor PGA are awarded attorney's fees and expenses in the aggregate amount of One Hundred Twenty-Three Thousand Eight Hundred Three

and 75/100 Dollars (\$123,803.75). Based on the statements made in the joint application, this award shall be in satisfaction of hours expended and costs incurred in connection with the PGA's monitoring and enforcement work during the period from July 1, 2010 through June 30, 2013.

It is so ORDERED.



Judge Kevin H. Sharp
United States District Judge

APPROVED FOR ENTRY:

s/ Martha A. Campbell
Martha A. Campbell
Deputy Attorney General
Office of the Attorney General & Reporter
425 Fifth Avenue North / P.O. Box 20207
Nashville, TN 37243
(615) 741-6420

s/ Jonathan P. Lakey
Jonathan P. Lakey (BPR #16788)
PIETRANGELO COOK
6410 Poplar Avenue, Suite 190
Memphis, TN 38119
(901) 685-2662

Attorneys for the State of Tennessee

s/ Dudley M. West
Dudley M. West (BPR #9083)
WHITE & REASOR, PLC
One American Center, Suite 1100
3100 West End Avenue
Nashville, TN 37203
(615) 383-3345

Attorneys for the Intervenor Parent-Guardian
Associations of Clover Bottom and Greene Valley
Developmental Centers

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2013, I caused copies of the foregoing Agreed Order on Joint Application for Award of Attorney's Fees and Expenses to the Parent Guardian Associations to be served upon the following counsel via the Court's electronic filing system or by first class mail, postage prepaid:

Dianne Stamey Dycus
Martha A. Campbell
Deputy Attorney General
Office of the Attorney General & Reporter
425 Fifth Avenue North / P.O. Box 20207
Nashville, TN 37243

Jonathan P. Lakey
PIETRANGELO COOK
6410 Poplar Avenue, Suite 190
Memphis, TN 38119
Attorneys for the State of Tennessee

R. Jonas Geissler
Senior Trial Attorney
Special Litigation Section
Civil Rights Division
U.S. Department of Justice
Patrick Henry Building
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001
Attorney for the United States

Jack W. Derryberry, Jr.
Derryberry & Derryberry
2400 Crestmoor Road
Nashville, TN 37215
Attorney for People First of Tennessee

s/ Dudley M. West